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15 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

16 ATTURO TIRE CORP.,

17 Case No. 2:19-cv-00198-JCM-VCF

18 Plaintiff,

19
20 **STIPULATION TO 30-DAY**
EXTENSION OF DEADLINE
TO AMEND PLEADINGS &
ADD PARTIES
(Second Request)

21 v.

22 MAX-TRAC TIRE CO., INC. d/b/a MICKEY
23 THOMPSON TIRES & WHEELS,

24 Defendant.

25 Pursuant to Paragraph B.(E). of the *Stipulated Discovery Plan* (ECF No. 29), as well as
26 Local Rule 26-4, Plaintiff Atturo Tire Corp. (“Plaintiff”) and Defendant Max-Trac Tire Co., Inc.
27 d/b/a Mickey Thompson Tires & Wheels (“Defendant”) hereby stipulate to a 30-day extension of
28 the following scheduling deadline:

<u>Deadline</u>	<u>Current Date</u>	<u>Stipulated Revised Date</u>
Amend Pleadings & Add Parties	September 23, 2019 (ECF No. 38)	October 23, 2019

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30 In support of this Stipulation, the parties state as follows:

31 1. On April 2, 2019 and April 3, 2019, respectively, Plaintiff served the *First Set Of*
32 *Requests For Production To Defendant* and the *First Set Of Interrogatories To Defendant*.

1 Pursuant to Local Rules IA 1-3(f) and 26-7, counsel for the parties have been working to resolve
2 issues relating to Defendant's June 3, 2019 responses to those requests. These efforts include
3 exchanging various discovery communications on June 11, 2019, June 28, 2019, July 8, 2019, July
4 12, 2019, July 15, 2019, July 16, 2019, July 26, 2019, August 9, 2019, August 12, 2019, August
5 16, 2019, August 21, 2019, and August 23, 2019. The parties' counsel also participated in
6 telephone conferences on July 10, 2019 and August 8, 2019 and have scheduled a third conference
7 for September 3, 2019.

8 2. In addition, counsel have been working to resolve issues relating to Defendant's
9 August 26, 2019 responses to Plaintiff's second sets of document requests and interrogatories, as
10 well as the August 8, 2019 responses of Defendant's parent company to Plaintiff's document
11 subpoena.

12 3. On June 11, 2019, Defendant served its first sets of document requests and
13 interrogatories to Plaintiff. Pursuant to Local Rules IA 1-3(f) and 26-7, counsel for the parties have
14 been working to resolve issues relating to Plaintiff's July 11, 2019 responses to those requests.
15 These efforts include exchanging discovery communications on July 18, 2019, July 25, 2019 and
16 August 7, 2019 and participating in a telephone conference on August 8, 2019.

17 4. In light of these efforts, the parties hereby enter into this Stipulation to extend the
18 upcoming September 23, 2019 deadline to amend the pleadings and add parties to October 23,
19 2019. This is the parties' second stipulation to extend the deadline due to the ongoing discovery.
20 *See* ECF No. 38. In so stipulating, Defendant does not concede, admit or agree that there is any
21 basis to add additional parties or claims, and is stipulating in the interest of compromise to avoid
22 the expenditure of the parties' and courts' resources.

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24 [SIGNATURES ON NEXT PAGE]

Jointly and respectfully submitted this 30th day of August 2019.

/s/ Brian C. Bianco

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Attorneys for Plaintiff Atturo Tire Corp.

Pursuant to the foregoing, **IT IS SO ORDERED.**

DATED this 29th day of August, 2019.

UNITED STATES MAGISTRATE JUDGE

/s/ Meng Zhong

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*Attorneys for Defendant Max-Trac Tire Co.,
d/b/a Mickey Thompson Tires & Wheels*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon all counsel of record via the Court's CM/ECF system on August 30, 2019.

/s/ Brian C. Bianco
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